

**Jorgensen, Jay T.**

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**From:** Kleibacker Lee, Krisann C. [KKLee@faegre.com]  
**Sent:** Wednesday, November 28, 2007 06:59 PM  
**To:** driggs@riggsabney.com; Bob Nance  
**Cc:** Jorgensen, Jay T.; Ehrich, Delmar R.; smcdaniel@mcdaniel-lawfirm.com; George, Robert W.; jelrod@cwlaw.com; James Graves; Jones, Tim; jgriffin@lathropgag.com; rsanders@youngwilliams.com; Jones, Bruce; Mark\_Quayle@cargill.com; Mann, Dara D.; John Tucker; Theresa Noble Hill; Ehrich, Delmar R.  
**Subject:** Poultry Defendants' List of 30(b)(6) Topics  
**Attachments:** Defendants Joint 30b6 topics list .doc

David and Bob:


In follow up to the parties' agreement placed on the record at the November 6th hearing and in anticipation of providing Magistrate Judge Joyner our required status update on November 30th, attached please find the current list of topics about which we Defendants as a group are prepared to take depositions of the State's designees.

To be clear, this list is not in derogation of any right the Defendants have, either jointly or individually, to seek depositions of the State or the State's employees or agents under any provision of Rule 30. Nonetheless, we felt it fair to provide this list so the Plaintiffs can assess how to respond efficiently.

We propose to start the deposition schedule with those topics in the first two notices. We would like to find dates in December and January to do so. We can discuss when and how to do the depositions on the remaining topics at an appropriate point after we set the schedule for the depositions of these first two notices. To this end, we are available tomorrow and Friday to begin these discussions.

We look forward to hearing from you.

Best regards, Krisann Kleibacker Lee

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07/12/2008